

1 Rongping Wu (*pro hac vice*)
2 *lwu@dgwllp.com*
3 Katherine Burghardt Kramer (*pro hac vice*)
4 *kkramer@dgwllp.com*
5 DGW KRAMER LLP
6 One Rockefeller Plaza, Ste 1060
7 New York, NY 10020
8 Tel.: (917) 633-6860
9 Fax: (917) 630-6183

10 Olivia M. Goetsch (State Bar No. 319012)
11 *ogoetsch@dgwllp.com*
12 DGW KRAMER LLP
13 7545 Irvine Center Drive, Ste 200
14 Irvine, CA 92618
15 Tel.: (949) 266-6311
16 Fax: (917) 630-6183

17 *Attorneys for Plaintiffs Hui MA, Ailing ZHAO, Xi LIU, Yixuan WANG, and Rui ZHANG*

18 UNITED STATES DISTRICT COURT
19 NORTHERN DISTRICT OF CALIFORNIA
20 SAN FRANCISCO DIVISION

21 HUI MA, AILING ZHAO, XI LIU,
22 YIXUAN WANG, and RUI ZHANG,

23 Plaintiffs,

24 v.

25 GOLDEN STATE RENAISSANCE
26 VENTURES, LLC, *dba* Golden Gate
27 Global, a California Limited Liability
28 Company; GSRV MANAGEMENT, LLC,
a California Limited Liability Company;
GSRV-VTI MANAGEMENT, LLC, a
California Limited Liability Company;
ERIC CHELINI, an individual; STEVEN
KAY, an individual; and VERTEBRAL
TECHNOLOGIES, INC., a Minnesota
corporation,

Defendants.

Case No. 3:21-cv-00856-WHO

**DECLARATION OF HUI MA IN
SUPPORT OF PLAINTIFFS'
OPPOSITION TO DEFENDANTS'
MOTIONS TO COMPEL
ARBITRATION**

Complaint filed: Feb. 3, 2021

Date: May 26, 2021
Time: 2 p.m.
Courtroom: Courtroom 2, 17th fl.
Judge: Hon. William H. Orrick

DECLARATION OF PLAINTIFF HUI MA

1. My name is Hui Ma. I am one of the Plaintiffs in this action.

我的姓名是马辉。我是本诉讼的原告之一。

2. I am a Chinese national.

我是中国公民。

3. I live in China.

我住在中国。

4. My native language is Chinese.

我的母语是中文。

5. I have very limited English proficiency.

我的英语水平非常有限。

6. In applying to the EB-5 Program and investing in the GSRV-VTI Project, I used and relied on the services of an immigration agency, Strong Union Consulting Ltd./Shurui Gao (“the Agency”).

在申请 EB-5 投资移民并投资 GSRV-VTI 项目时，我使用并依赖了来自移民代理机构 Strong Union Consulting Ltd./Shurui Gao (“代理机构”) 的服务。

7. I received every document that I was asked to sign about the GSRV-VTI Project from the Agency, via email.

我通过电子邮件收到了来自代理机构的要求我签署的所有 GSRV-VTI 项目相关文件。

1 8. I did not receive any contract documents directly from any of the named
2 Defendants.

3 我没有直接从任何一位被告处收到过任何合同文件。

4
5 9. The English version of the Subscription Agreement for GSRV-VTI LP
6 (“**Subscription Agreement**”) is the only complete contract that I received and was told to sign.
7 英文版 GSRV-VTI LP 认购协议（《**认购协议**》）是我所收到并被告知签署的唯一
8 完整的合同。

9
10 10. I did not receive a complete translation of the Subscription Agreement in Chinese.
11 But the Agency sent me what I understood to be a detailed summary, in Chinese, of the
12 Subscription Agreement’s most important points, *i.e.*, the points that were important for me to
13 know and understand.

14 我没有收到《认购协议》的完整中文译本。但是，我从代理机构处收到了我认为详
15 细总结了认购协议要点（例如我需要知道并了解的要点）的中文译本。

16
17 11. I did not receive a translation for any other supposed agreements between the
18 Defendants and me.

19 我没有收到其它任何被告与我之间假定协议的中文译本。

20
21 12. Even after I signed the Subscription Agreement, I was not sent or asked to review
22 a copy of the Partnership Agreement for GSRV-VTI LP attached as Exhibit D to Mr. Chelini’s
23 declaration (“**Defendants’ Exhibit D**”).

24 即使在我签署了《认购协议》后，我也没有收到或被要求审阅 GSRV-VTI LP 的合
25 伙协议，详见 Chelini 先生的宣言附录 D（“**被告文件附录 D**”）。

26
27 13. I do not recognize the contents of Defendants’ Exhibit D. As best I can tell, I have
28 never seen this document before.

1 我不知道被告文件附录 D 的内容。我可以说的是，我从未见过此文件。

2
3 14. I was not given a copy of the Partnership Agreement for GSRV-VTI LP before I
4 signed the Subscription Agreement.

5 在签署《认购协议》之前，我并没有收到 GSRV-VTI LP 的合伙协议副本。

6
7 15. I did not know that the Partnership Agreement for GSRV-VTI LP contains a
8 supposed arbitration agreement.

9 我并不知道 GSRV-VTI LP 的合伙协议还包含了一个假定的仲裁协议。

10
11 16. I was never told about any “arbitration agreement.”

12 我从来没有被告知有“仲裁协议”。

13
14 17. I did not intend to agree to arbitrate any dispute in connection with my investment
15 in the GSRV-VTI Project.

16 我无意同意就我对 GSRV-VTI 项目投资相关的任何争议进行仲裁。

17
18 18. I did not expect that any agreement between me and any Defendant might contain
19 an agreement to arbitrate disputes in connection with my investment in the GSRV-VTI Project.

20 我没有想到我与任何一位被告之间的任何协议可能包含了我对 GSRV-VTI 项目的投
21 资相关的争议进行仲裁的协议。

22
23 19. My contract with the immigration agency does not contain an arbitration
24 agreement.

25 我与移民代理机构的合同并不包含仲裁协议。

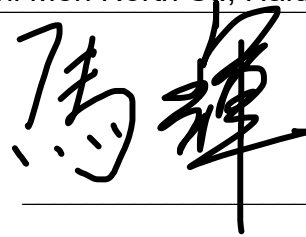
26
27 20. I am not familiar with the U.S. judicial system.

28 我对美国的司法系统并不熟悉。

1
2 21. I am not familiar with “JAMS,” the JAMS rules, or how those rules are different
3 from the rules of this Court.

4 我并不熟悉“JAMS”，JAMS 的规则，以及这些规则如何不同于本法院的规则。
5
6
7

8 I declare under penalty of perjury under the law of the United States that the foregoing is
9 true and correct. Executed at 4A1903, 41st Xi Zhi Men North St., Haidian District, Beijing,
10 P.R.C. this 4 day of May, 2021.



11
12
13 MA Hui
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Certificate of Translation

I, Fengji Jin, being duly sworn and deposed, hereby swear and attest to the following:

That I am fluent in both the English and the Chinese languages. I hereby certify that I have translated the following documents from English into Chinese which are attached to this Certificate: Declaration of Plaintiff Rui Zhang, Declaration of Plaintiff Xi Liu, Declaration of Plaintiff Ailing Zhao, Declaration of Plaintiff Hui Ma, and Declaration of Plaintiff Yixuan Wang.

I further certify that, to the best of my knowledge, the attached documents in Chinese are true and accurate translation of the attached documents in English.

Signed on May 4th, 2021
in Fairfax, Virginia
County

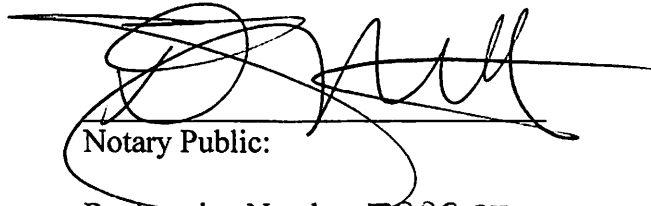

Name: Fengji Jin

State/Commonwealth of Virginia)
County/City of Fairfax) ss:

The foregoing instrument was acknowledged and sworn before me this date
of 4 month of May year of 2021

by Fengji Jin

DANIELLE LYNNE SALETTA
NOTARY PUBLIC
REG. #7889276
COMMONWEALTH OF VIRGINIA
MY COMMISSION EXPIRES
SEPTEMBER 30, 2024


Notary Public:
Registration Number: 7889276
My commission expires on: September 30, 2024